



May 12, 2022

California Citizens Redistricting Commission  
721 Capitol Mall, Suite 260  
Sacramento, CA 95814

*Sent via electronic transmission*

Re: Public Notice Period

Dear Chair Sinay, Vice Chair Toledo, and Commissioners:

Thank you for the hard work you are putting into this post-mapping phase. Future Citizens Redistricting Commissions (CRC) will thank you for your efforts. Our organizations write to share our concerns with what we fear may be a misstep in the policy recommendations you are developing. Specifically, we oppose shortening the public notice period within three months of the map-drawing deadline.

The drafters of Proposition 11 spent two years working on the requirements which were put into the measure. The League of Women Voters of California and California Common Cause interviewed community-based organizations throughout the state as well as many individual Californians about hearing notice processes that would make it easier to speak to the CRC. What we heard over and over, from many people, was that in order to think about and create testimony about their community of interest, reserve time out of their schedules to testify, and to testify on the appointed date(s), at least 14 days public notice was necessary. Anything less made it extremely difficult, if not impossible, to assemble the relevant material, prepare testimony, and alter one's schedule in order to speak.

The three-day notice mandated for local governments in the Brown Act was not viewed as helpful. We heard countless examples of the following scenario, from regular Californians' experiences trying to engage with their city councils, school boards, and so on.

For a public meeting on Tuesday, the notice would go up on the local jurisdiction's website late Friday night. Usually the notice was buried inside a nest of webpages. Certainly it didn't appear on the homepage. Only those capable of navigating and constantly monitoring the local jurisdiction's website would get the needed info in a timely way.

Because the agenda materials were posted just three days before the meeting, you would find out if you needed to speak to the city council, school board, or other local government body late in the process, forcing you to scramble to find the time. If the meeting was in the evening, you would then rush to arrange child care, and when you arrived at the location, you would hope

that you wouldn't have to wait until midnight to speak. If the meeting was during the day, anybody who was employed and/or had the care of young children or other family members was effectively prevented from speaking. The only people who could afford to work within this structure were paid lobbyists, contractors, other interested parties, and community organizations who had staff or dedicated volunteers. This subset obviously does not include millions of Californians.

We deliberately put the 14 days public notice requirement – an increase from the 10 days mandated by the Bagley Keene Act – into the law to address this problem. We wanted to engage and empower all Californians, not just a very small subset, in the redistricting process. The 14 days was a deliberate choice, with the goal of maximizing broad public input.

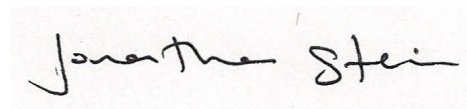
Removing the 14-days public notice requirement three months before the final maps are drawn creates the danger of replicating the situation described above. It would pose no problem for paid lobbyists and organizations with staff or dedicated volunteers. But it would guarantee that millions of Californians would face barriers to engaging in the redistricting process. The CRC has frequently stated its concern that individuals should be engaged in this process and speak directly to the commission. To that goal, we oppose this contemplated reduction in public notice.

Thank you so much for your consideration. If you have questions, please feel free to reach out to us at [redistricting@lwvc.org](mailto:redistricting@lwvc.org) or [jstein@commoncause.org](mailto:jstein@commoncause.org).

Sincerely,



Carol Moon Goldberg, President  
League of Women Voters of California



Jonathan Mehta Stein, Executive Director  
California Common Cause

Cc: Alvaro Hernandez, Executive Director  
Anthony Pane, Chief Counsel